

# Exhibit 18

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 22-2442-PET

Petition of Industrial Tower and Wireless, LLC       )  
for a Certificate of Public Good,                               )  
pursuant to 30 V.S.A. § 248a, authorizing                )  
the construction of a wireless telecommunications       )  
facility in Ira, Vermont.                                        )

**RESPONSE OF INDUSTRIAL TOWER & WIRELESS, LLC  
TO MOTIONS FOR PERMISSIVE INTERVENTION**

Petitioner, Industrial Tower and Wireless, LLC (“ITW”), by its counsel, MSK Attorneys, submits this Response to the Motions for Permissive Intervention made by certain parties owning property near the proposed site of the wireless communications facility (“Facility”) that is the subject of the present case.<sup>1</sup>

Although the parties that have moved for intervention (“Moving Parties”) who live along Vermont Route 133 would only have views of the tower portion of the Facility that are backdropped by hills and trees, ITW does not object to any of the Moving Parties’ requests for permissive intervention on aesthetic grounds and those of “orderly development.” However, the Moving Parties’ arguments concerning exposure to radio frequency waves, effects on property values, historic resources, wildlife and alleged defects in the process established by the Legislature in 30 V.S.A. § 248a either fall outside this Commission’s jurisdiction or the interests asserted thereunder will be adequately protected by the Department of Public Service. *See Petition of New Cingular Wireless PCS, LLC*, Case No. 21-1144-PET, Order of 5/17/21 at 2 (reaching similar conclusion). Therefore, ITW objects to the Moving Parties’ motions to intervene on those grounds.

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<sup>1</sup> Ms. Annette Smith listed her address as “Danby, Vermont” in the comments she filed. It is not clear where her property is in relation to the Facility.

Dated: September 29, 2022  
Burlington, Vermont

Respectfully submitted,

By: S/ Brian Sullivan  
Brian J. Sullivan

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